

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ROBERT CORWIN,

Plaintiff,

-- against --

XIANGZHI CHEN, ANHUI GUO, and  
ANDREW WEIWEN CHEN,

Defendants,

-- and --

SHENGDATECH, INC.,

Nominal Defendant.

Civil Action No. 1:11-cv-02457 (TPG)

**SUGGESTION OF BANKRUPTCY**

PLEASE TAKE NOTICE THAT on August 19, 2011 (the “**Petition Date**”) ShengdaTech, Inc. (the “**Debtor**”) filed a voluntary petition under title 11, chapter 11 of the United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the District of Nevada (the “**Bankruptcy Court**”). The Debtor’s chapter 11 case is being administered as Case No. 11-52649 before the Bankruptcy Court.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Section 362 of the Bankruptcy Code, as of the Petition Date, *inter alia*, (i) no cause of action against the Debtor may be commenced, prosecuted or continued; (ii) no judgment may be taken against the Debtor; (iii) no judgment against the Debtor obtained prior to the Petition Date may be enforced; (iv) no act that would exercise control over property of Debtor’s bankruptcy estate may be taken; and (v) no act to collect, assess, or recover a claim against the debtor that arose before the Petition Date may be taken, outside of the Bankruptcy Court without the Bankruptcy Court’s first issuing an order modifying the automatic stay imposed by Section 362 of the Bankruptcy Code.

Dated: September 2, 2011

Respectfully submitted,

**SHENGDATECH, INC**

/s/ Robert A. Horowitz

Robert A. Horowitz

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